

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF	)	
CARPENTERS PENSION FUND, et al.,	)	
	)	
Plaintiffs,	)	14 CV 3738
v.	)	
	)	
ARCHITECTURAL SYSTEMS, INC., an	)	Judge Lee
Illinois corporation,	)	
	)	
Defendant.	)	

**PLAINTIFFS' MOTION FOR FINAL JUDGMENT**

Plaintiffs, the CHICAGO REGIONAL COUNCIL OF CARPENTERS PENSION FUND, ET AL. (collectively "Trust Funds"), by their attorney Kevin P. McJessy, hereby move this Court pursuant to Federal Rules of Civil Procedure 54, 55 and 58 to enter a final judgment against ARCHITECTURAL SYSTEMS, INC. ("Defendant"). In support of their motion, Trust Funds state as follows:

**Complaint**

1. The Trust Funds filed a complaint against the Defendant under ERISA to compel an audit of Defendant's books and records for the period January 1, 2012 through March 31, 2014, for collection of unpaid contributions, interest and liquidated damages, and for attorneys' fees and auditors' fees pursuant to the collective bargaining agreements and the trust agreements to which Defendant is signatory.

**Default Judgment**

2. Defendant was served with a copy of the summons and complaint. Defendant failed to answer or appear. On August 20, 2014, the Trust Funds filed a motion for entry of an order of default. *See* Plaintiffs' Motion for Entry of an Order of Default, Docket Report No. 9.

3. On September 2, 2014, this Court entered an order of default ("Default Order") against Defendant which provided, in part, that:

Pursuant to Federal Rule of Civil Procedure 55, an order of default is hereby entered in favor of the Chicago Regional Council of Carpenters Pension Fund *et al.* ("Trust Funds") and against defendant Architectural Systems, Inc., an Illinois corporation ("Defendant"). Defendant is hereby ordered:

- A. to provide the Trust Funds or their designated auditors, Legacy Professionals, LLP complete access to Defendant's books records within twenty-one (21) days so that the Trust Funds may conduct an audit of Defendant's fringe benefit contributions for the period January 1, 2012 through the present;
- B. to pay any and all amounts the Trust Funds may discover to be due pursuant to the audit;
- C. to pay auditor's fees incurred by the Trust Funds to complete the audit of Defendant's books and records;
- D. to pay interest on the amount that is due;
- E. to pay interest or liquidated damages on the amount that is due, whichever is greater; and
- F. to pay reasonable attorneys' fees and costs the Trust Funds incurred in this action and attorneys' fees that the Trust Funds incur to obtain full compliance with this Order and to collect any amounts due and owing to the Trust Funds.

It is further ordered that the Court reserves the right to award such other and further relief as the Court deems just and equitable.

A copy of the Default Order is attached hereto as Exhibit A.

#### **Completion of Audit**

4. Defendant was subsequently served with a copy of the order but failed to submit to an audit. On September 25, 2014, the Trust Funds filed a motion for rule to show cause seeking to obtain Defendant's compliance with the Default Order. *See* Plaintiffs' Motion for Rule to Show Cause, Docket Report No. 13.

5. Subsequently, Defendant produced records to Legacy Professionals, LLP (“Legacy”). Legacy completed an audit of Defendant’s books and records based on the information provided to them. *See* Decl. of J. Libby, ¶7, Exh. B.

6. After Legacy completed the Audit Report, the Trust Funds provided a copy to Defendant. Thereafter, Defendant produced additional documents to the Trust Funds to address the audit findings.

7. The Trust Funds adjusted the Audit Report based on the additional records and information produced by Defendant. A copy of the adjusted Audit Report is attached to the Declaration of J. Libby as Exhibit B-3. *See* Decl. of J. Libby, ¶8, Exh. B.

### **Final Judgment**

8. Based on the records produced by Defendant and the adjusted Audit Report, the Trust Funds now move this Court to enter a final judgment. The amount owed by Defendant is \$28,605.31, which is comprised of the following:

- A. **The Trust Funds are owed \$15,220.68 in unpaid contributions.** *See* Decl. of J. Libby, ¶8, Exh. B.
- B. **The Trust Funds are owed \$4,021.20 for auditor’s fees incurred by the Trust Funds to complete the audit of Defendants’ books and records.** *See* Decl. of J. Libby, ¶12, Exh. B. *See also* *Trustees of the Chicago Plastering Institute Pension Trust v. Cork Plastering Co.*, 570 F.3d 890, 902 (7th Cir. Ill. 2009) (“ERISA itself grants the district court authority to award the plaintiffs their reasonable attorney's fees and costs . . . This court, among others, has construed the latter provision to include an award of audit costs.”); *Moriarty ex rel. Local Union No. 727, I.B.T. Pension Trust v. Svec*, 429 F.3d 710, 721 (7th Cir. 2005).
- C. **The Trust Funds are owed \$587.98 in interest under ERISA on the amount that is due.** *See* 29 U.S.C. § 1132(g)(2)(B); 29 U.S.C. § 1132(g)(2)(C); Decl. of J. Libby, ¶11, Exh. B.
- D. **The Trust Funds are owed \$3,003.05 in liquidated damages.** *See* Decl. of J. Libby, ¶11, Exh. B; 29 U.S.C. § 1132(g)(2)(B).
- E. **The Trust Funds are owed \$5,772.40 in reasonable attorneys’ fees and costs the Trust Funds incurred in this action.** *See* Decl. of J. Libby, ¶10, Exh. B;

Decl. of McJessy, ¶4, Exh. C; 29 U.S.C. § 1132(g)(1) and (g)(2)(D). *See also Trustees of the Chicago Plastering Institute Pension Trust v. Cork Plastering Co.*, 570 F.3d 890, 902, 903 (7th Cir. Ill. 2009); *Chicago Regional Council of Carpenters Pension Fund v. RCI Enterprises, Inc.*, 2011 U.S. Dist LEXIS \*6-7 (N.D. Ill., July 20, 2011) (Feinerman, J.); *Board of Trustees of the Rockford Pipe Trades Indus. Pension Fund v. Fiorenza Enters.*, 2011 U.S. Dist. LEXIS 28209, 21-22 (N.D. Ill. Mar. 18, 2011).

9. The Trust Funds are also entitled to recover attorneys' fees incurred to enforce or collect the amounts due. *See Free v. Briody*, 793 F.2d 807, 808-09 (7<sup>th</sup> Cir. 1986) (holding that union-affiliated fringe benefit funds are entitled to collect attorneys' fees for work incurred to collect on a judgment rendered under ERISA).

10. A proposed draft order is attached as Exhibit D.

WHEREFORE, Plaintiffs the Chicago Regional Council of Carpenters Pension Fund *et al.* hereby move this Court to enter judgment in their favor and against Defendant in the amount of \$28,605.31 as follows:

- A. \$15,220.68 in unpaid contributions pursuant to the audit;
- B. \$4,021.20 for auditor's fees of incurred by the Trust Funds to complete the audit of Defendants' books and records;
- C. \$587.98 in interest under ERISA on the amount that is due;
- D. \$3,003.05 in liquidated damages;
- E. \$5,772.40 in reasonable attorneys' fees and costs the Trust Funds incurred in this action;
- F. reasonable attorney' fees and costs incurred by the Trust Funds in enforcing this order; and
- G. such other relief as this Court deems appropriate.

CHICAGO REGIONAL COUNCIL OF CARPENTERS  
PENSION FUND *et al.*

By: s/ Kevin P. McJessy  
One of their attorneys

Kevin P. McJessy  
MCJESSY, CHING & THOMPSON, LLC  
3759 North Ravenswood, Suite 231  
Chicago, Illinois 60613  
(773) 880-1260  
(773) 880-1265 (facsimile)  
mcjessy@MCandT.com

**CERTIFICATE OF SERVICE**

I, Kevin P. McJessy, an attorney, certify that I caused the foregoing **Plaintiffs' Motion for Final Judgment** to be served upon

Architectural Systems, Inc.  
c/o James Chavez, President  
4224 Foxborough Court  
Kankakee, IL 60901

Graham Hartung  
1857 E. Burville Rd.  
Crete, IL 60417

via U.S. Mail deposited in the United States Mail Depository at 3759 N. Ravenswood, Chicago, Illinois, postage prepaid, this 20th day of February 2015.

s/ Kevin P. McJessy  
Kevin P. McJessy

**14 CV 03738**

**Exhibit A**

*CLP*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF	)	
CARPENTERS PENSION FUND, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	14 CV 3738
v.	)	
	)	
ARCHITECTURAL SYSTEMS, INC., an	)	Judge Lee
Illinois corporation,	)	
	)	
Defendant.	)	

**ORDER**

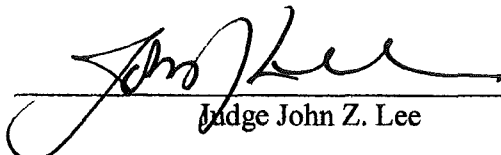
Pursuant to Federal Rule of Civil Procedure 55, an order of default is hereby entered in favor of the Chicago Regional Council of Carpenters Pension Fund *et al.* ("Trust Funds") and against defendant Architectural Systems, Inc., an Illinois corporation ("Defendant"). Defendant is hereby ordered:

- A. to provide the Trust Funds or their designated auditors, Legacy Professionals, LLP complete access to Defendant's books records within twenty-one (21) days so that the Trust Funds may conduct an audit of Defendant's fringe benefit contributions for the period January 1, 2012 through the present;
- B. to pay any and all amounts the Trust Funds may discover to be due pursuant to the audit;
- C. to pay auditor's fees incurred by the Trust Funds to complete the audit of Defendant's books and records;
- D. to pay interest on the amount that is due;
- E. to pay interest or liquidated damages on the amount that is due, whichever is greater; and
- F. to pay reasonable attorneys' fees and costs the Trust Funds incurred in this action and attorneys' fees that the Trust Funds incur to obtain full compliance with this Order and to collect any amounts due and owing to the Trust Funds.

It is further ordered that the Court reserves the right to award such other and further relief as the Court deems just and equitable.

Trust Funds shall serve a copy of this Order on Defendant.

9/2/14  
Date

  
Judge John Z. Lee



**14 CV 03738**

**Exhibit B**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF	)	
CARPENTERS PENSION FUND, et al.,	)	
	)	
Plaintiffs,	)	14 CV 3738
v.	)	
	)	Judge Lee
ARCHITECTURAL SYSTEMS, INC., an Illinois	)	
corporation,	)	
	)	
Defendant.	)	

**DECLARATION OF JOHN LIBBY**

I, John Libby, hereby declare, under penalty of perjury pursuant to the laws of the United States, that the following statements are true to the best of my knowledge information and belief:

1. I am the Manager, Audits & Collections for the Chicago Regional Council of Carpenters Pension Fund, the Chicago Regional Council of Carpenters Welfare Fund, the Chicago and Northeast Illinois Regional Council of Carpenter Apprentice and Trainee Program and the Labor/Management Union Carpentry Cooperation Promotion Fund (collectively "the Trust Funds").
2. As part of my duties, I am responsible for managing the collection of contributions for medical, pension and other benefits due from numerous employers pursuant to collective bargaining agreements between the employers and the Chicago and Northeast Illinois Regional Council of Carpenters ("Union") and between employers and the United Brotherhood of Carpenters and Joiners of America.
3. ARCHITECTURAL SYSTEMS, INC. ("Defendant") is an employer bound by a collective bargaining agreement with the Union ("Area Agreement"). A copy of the Agreement dated March 14, 1997 between Defendant and the Union by which Defendant agreed to be bound

by the Area Agreement is attached as Exhibit B-1. The Agreement binds Defendant to the Area Agreement with the Union and the trust agreements establishing the Trust Funds. The Agreement, the Area Agreement and the trust agreements are collectively referred to herein as "Agreements."

4. Pursuant to the Agreements, Defendant is required to pay fringe benefit contributions to the Trust Funds for work performed by Defendant's employees and non-union subcontractors performing work falling within the jurisdiction of the Union.

5. Pursuant to the Agreements, Defendant also agreed to submit to a periodic audit of its books and records in order to verify the accuracy of the contributions reported and paid to the Trust Funds.

6. The Trust Funds engaged Legacy Professionals, LLP ("Legacy") to conduct an audit of Defendant's fringe benefit contributions to the Trust Funds for the period January 1, 2012 through March 31, 2014.

7. Defendant produced records to Legacy. Legacy prepared a report of Defendant's fringe benefit contributions to the Trust Funds based on Legacy's review of the records produced by Defendant. Legacy delivered a copy of its Audit Report to the Trust Funds for Defendant's account. The Trust Funds maintain a copy of Legacy's audit report in their files as part of their ordinary course of business. A true and accurate copy of the Audit Report prepared by Legacy after its review of records produced by Defendant is attached as Exhibit B-2.

8. Thereafter, Defendant produced additional documents to the Trust Funds in order to explain why it believed that it did not owe all of the contributions set forth in the Audit Report prepared by Legacy. Based on the records produced by Defendant, the Trust Funds adjusted the original Audit Report. A copy of the adjusted Audit Report is attached as Exhibit B-3,

According to the adjusted Audit Report and based on the records produced by Defendant to Legacy and to the Trust Funds, Defendant owes \$15,220.68 in unpaid fringe benefit contributions to the Trust Funds.

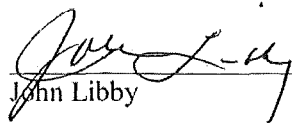
9. The Agreements provide that the Trust Funds collect liquidated damages on unpaid fringe benefit contributions at a rate of 1½ percent compounded monthly and capped at 20 percent. The Agreements also provide that the Trust Funds collect interest on unpaid fringe benefit contributions as allowed by law.

10. Because Defendant failed to comply with the terms of the Agreements, the Trust Funds have had to employ the services of attorney McJessey Ching & Thompson, LLC. As a result, the Trust Funds incurred attorneys' fees and costs.

11. A summary of the updated calculations of accrued interest and liquidated damages as of February 20, 2015 is attached hereto as Exhibit B-4. Defendant owes \$587.98 in unpaid interest calculated pursuant to 26 U.S.C. §6621 and \$3,003.05 in unpaid liquidated damages calculated in accordance with the Agreements.

12. The Trust Funds paid Legacy \$4,021.20 as auditors' fees for Legacy to conduct its review of Defendant's books and records and to prepare the Audit Reports.

13. I have personal knowledge of the matters stated in this affidavit and could testify competently to them.

  
\_\_\_\_\_  
John Libby  
  
2/20/15  
\_\_\_\_\_  
Date

**14 CV 03738**

**Exhibit B-1**

## MEMORANDUM OF AGREEMENT

---

Firm Architectural Systems, Inc. Address 11 Cumberland Court  
City Cary State IL Zip 60013 Phone 847/639-8484

THIS AGREEMENT is entered into between the CHICAGO AND NORTHEAST ILLINOIS DISTRICT COUNCIL OF CARPENTERS, COOK, DUPAGE, GRUNDY, IROQUOIS, KANE, KANKAKEE, KENDALL, LAKE, MCHENRY and WILL COUNTIES, ILLINOIS, hereinafter referred to as the "UNION" and

### ARCHITECTURAL SYSTEMS, INC.

its successors and assigns, hereinafter referred to as the "EMPLOYER".

This Agreement is made in consideration of the instant promises of the UNION and the EMPLOYER and the parties do hereby agree as follows:

1. The EMPLOYER recognizes the UNION as the sole and exclusive bargaining agent for and on behalf of the Employees of the EMPLOYER within the territorial and occupational jurisdiction of the UNION. Prior to recognition, the EMPLOYER has reviewed valid evidence and agrees that the UNION is the exclusive designated Bargaining Representative of a majority of the appropriate bargaining unit employees of the EMPLOYER.

2. The EMPLOYER and the UNION, hereby incorporate by reference and agree to be bound by the Area Agreements in effect on the date this document is executed through their respective expiration dates. Those Agreements include, but are not limited to, the following:

the Area Agreement negotiated between the UNION and the Mid-America Regional Bargaining Association (M.A.R.B.A.), the Addendum negotiated between the UNION and the Residential Construction Employers Council (R.C.E.C.) covering Cook, Lake and DuPage Counties, the Agreement negotiated between the Union and the Contractors Association of Will and Grundy Counties covering Grundy County, the Agreement negotiated between the Union and the Contractors Association of Will and Grundy Counties covering Will County, the Agreement negotiated between the Union and the Residential Construction Employers Council (R.C.E.C.) covering Will County, the contract negotiated between the UNION and the Kankakee and Iroquois County Contractors Association, the Agreement negotiated between the UNION and the Fox Valley Contractors Association, and the Residential Construction Employers Council (R.C.E.C.) covering Kane, Kendall and McHenry County, as well as any contracts

negotiated between the UNION and other associations involved in various subtrades within the Union's occupational jurisdiction.

3. The EMPLOYER agrees to be bound by the terms of the Trust Agreements of the Fringe Benefit Trust Funds to which contributions are required to be made under the Agreements referred to in numbered paragraph 2 hereof and all rules and regulations adopted by the Trustees thereof. The EMPLOYER further agrees to make prompt payments of the per hour contributions with respect to each Trust Fund for all Employees performing bargaining unit work and/or covered by the Agreement including nonbonded and nonsignatory subcontractors as required by the applicable provisions of each agreement.

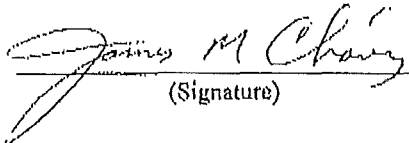
4. This Agreement and the adoption of the Area Agreement and Declarations of Trust referred to in paragraphs two and three above, shall be effective upon the date that this document is executed and remain in full force and effect to and including the expiration date of the respective Area Agreements adopted herein. Unless the EMPLOYER gives written notice to the UNION of its desire to terminate or modify the Agreement at least three (3) calendar months prior to the expiration of such Agreements, the Agreement shall continue in full force and effect through the full term and duration of all subsequent agreements(s).

5. EMPLOYER HEREBY ACKNOWLEDGES RECEIPT OF THE AREA AGREEMENT AS WELL AS COPIES OF THE AGREEMENTS INCORPORATED BY REFERENCE THEREOF FOR ALL TEN (10) COUNTIES.

IN WITNESS WHEREOF the parties have executed this Memorandum of Agreement the  
14<sup>th</sup> day of March, 19 97

EMPLOYER: Architectural CHICAGO AND NORTHEAST ILLINOIS  
Systems, Inc. DISTRICT COUNCIL OF CARPENTERS

By: Mr. James M. Chavez, President  
(Print or Type Name) (Title)

  
(Signature)

2

  
(District Council Officer)

**14 CV 03738**

**Exhibit B-2**



# Records Reviewed

Account Number:	21403	Audit Period:	January 1, 2012 to March 31, 2014
Employer:	Architectural Systems Inc	Contact:	Jim Chavez
Address:	4224 Foxborough Circle	Title:	President
	Kankakee, IL 60901	Phone:	(847) 639-8484
Phone:	(847) 639-8484		

## Audit Results

Discrepancy Total Hours	2,253.50
Discrepancy Benefit Hours	12,425.50
Discrepancy Amount	\$325,524.46
Liquidated Damages	\$62,373.13
<b>Grand Total</b>	<b>\$ 387,897.59</b>

## Associated Account(s)

## Reviewed

## Employer Records

Yes	Annual Federal Unemployment Tax Return (940)
Yes	Bank Statements
No	Cash Disbursement Journals
Yes	Check Register / Cancelled Checks / Vouchers
N/A	Construction Loan Data
Incomplete	Contribution Reports to All Other Funds
Yes	Contribution Reports to Audited Funds
Yes	Federal Income Tax Returns (1120 or 1065)
No	General Ledgers
Incomplete	Individual Earnings Records
No	Invoices from Sub-Contractors
No	Job List/Job Cost Records
N/A	Miscellaneous Income Payment Reports (1099)
Incomplete	Payroll Journals
Yes	Quarterly Federal Tax Returns (941)
Yes	Quarterly Unemployment Wage Reports
N/A	Summary of Information Returns (1096)
No	Time Cards
Yes	Transmittal of Income and Tax Statements (W-3)
No	Vendor List
Yes	Wage and Tax Statements (W-2)

Audit Type: Closed Account

Copy Forwarded to Attorney

Date Reviewed:

12/1/14

Reviewer:

Victor Amador J CPA

# Discrepancy Summary By Month

Account Number:	21403	Audit Period:	January 1, 2012 to March 31, 2014
Employer:	Architectural Systems Inc	Contact:	Jim Chavez
Address:	4224 Foxborough Circle	Title:	President
	Kankakee, IL 60901		
Phone:	(847) 639-8484	Page:	1 of 29

Reporting Period		Discrepancy Total Hours	Discrepancy Benefit Hours	Contribution Rate	Discrepancy Amount	
January 2012		6.00	30.50	24.32	\$741.76	
February 2012			169.50	24.32	\$4,122.24	
March 2012			71.00	24.32	\$1,726.72	
April 2012		24.50	64.75	24.32	\$1,574.72	
May 2012			500.50	24.32	\$12,172.16	
June 2012		72.00	246.00	25.67	\$6,314.82	
July 2012		96.00	144.25	25.67	\$3,702.90	
August 2012		29.00	845.75	25.67	\$21,710.40	
September 2012		16.25	64.50	25.67	\$1,655.72	
October 2012		197.25	305.75	25.67	\$7,848.60	
November 2012		114.00	1,090.50	25.67	\$27,993.14	
December 2012		109.50	157.75	25.67	\$4,049.44	
January 2013		46.25	311.00	25.67	\$7,983.37	
February 2013		133.50	859.25	25.67	\$22,056.95	
March 2013		146.25	190.25	25.67	\$4,883.72	
April 2013		376.00	472.25	25.67	\$12,122.66	
May 2013		81.75	493.00	25.67	\$12,655.31	
June 2013		83.00	728.75	26.87	\$19,581.51	
July 2013		32.75	1,704.00	26.87	\$45,786.48	
August 2013			235.25	26.87	\$6,321.17	
September 2013			959.00	26.87	\$25,768.33	
October 2013		84.00	326.75	26.87	\$8,779.77	
November 2013		88.00	960.25	26.87	\$25,801.92	
December 2013		240.50	784.00	26.87	\$21,066.08	
January 2014		68.75	249.75	26.87	\$6,710.78	
February 2014		208.25	461.25	26.87	\$12,393.79	
	Total Hours	2,253.50	Benefit Hours	12,425.50	Discrepancy Amount Liquidated Damages Total Amount Due	\$325,524.46 \$62,373.13 \$387,897.59

## Discrepancy Summary By Error Type

Account Number:	21403	Audit Period:	January 1, 2012 to March 31, 2014
Employer:	Architectural Systems Inc	Contact:	Jim Chavez
Address:	4224 Foxborough Circle Kankakee, IL 60901	Title:	President
Phone:	(847) 639-8484	Page:	2 of 29

Code	Description	Dollar Amount
<b>SIGNATORY EMPLOYER: PAYROLL</b>		
P1	Clerical Error	\$10,385.19
P2	Prior to Hours	\$8,583.90
P8	Electronic Record Reported Exclusively to Other Trust Fund(s) Clerical Error	(\$256.70)
P8Q	Electronic Record Reported Exclusively to Other Trust Fund(s) Clerical Error - calculated hours	\$4,261.90
<b>SIGNATORY EMPLOYER: CASH DISBURSEMENTS</b>		
CD2	Prior to Hours	\$3,304.88
CD15	Bonus / Additional Pay	\$5,250.86
CD41	Non-signatory Subcontractor 100% Labor Factor	\$266,752.03
CD49	Individual Paid Through Cash Disbursements No Invoice Provided	\$27,242.40
Sub-Total Discrepancies From All Listed Codes		\$325,524.46
Liquidated Damages		\$62,373.13
Total Amount Due		\$387,897.59

# Liquidated Damages Schedule

Account Number:	21403	Audit Period:	January 1, 2012 to March 31, 2014
Employer:	Architectural Systems Inc	Contact:	Jim Chavez
Address:	4224 Foxborough Circle Kankakee, IL 60901	Title:	President
Phone:	(847) 639-8484	Page:	3 of 29

Reporting Period	Contributions Due	Compounding Periods	Calculating Percentage	Total Liquidated Damages Owed
January 2012	\$741.76	33.00	20.00%	\$148.35
February 2012	\$4,122.24	32.00	20.00%	\$824.45
March 2012	\$1,726.72	31.00	20.00%	\$345.34
April 2012	\$1,574.72	30.00	20.00%	\$314.94
May 2012	\$12,172.16	29.00	20.00%	\$2,434.43
June 2012	\$6,314.82	28.00	20.00%	\$1,262.96
July 2012	\$3,702.90	27.00	20.00%	\$740.58
August 2012	\$21,710.40	26.00	20.00%	\$4,342.08
September 2012	\$1,655.72	25.00	20.00%	\$331.14
October 2012	\$7,848.60	24.00	20.00%	\$1,569.72
November 2012	\$27,993.14	23.00	20.00%	\$5,598.63
December 2012	\$4,049.44	22.00	20.00%	\$809.89
January 2013	\$7,983.37	21.00	20.00%	\$1,596.67
February 2013	\$22,056.95	20.00	20.00%	\$4,411.39
March 2013	\$4,883.72	19.00	20.00%	\$976.74
April 2013	\$12,122.66	18.00	20.00%	\$2,424.53
May 2013	\$12,655.31	17.00	20.00%	\$2,531.06
June 2013	\$19,581.51	16.00	20.00%	\$3,916.30
July 2013	\$45,786.48	15.00	20.00%	\$9,157.30
August 2013	\$6,321.17	14.00	20.00%	\$1,264.23
September 2013	\$25,768.33	13.00	20.00%	\$5,153.67
October 2013	\$8,779.77	12.00	19.56%	\$1,717.32
November 2013	\$25,801.92	11.00	17.79%	\$4,590.16
December 2013	\$21,066.08	10.00	16.05%	\$3,381.11
January 2014	\$6,710.78	9.00	14.34%	\$962.33
February 2014	\$12,393.79	8.00	12.65%	\$1,567.81
Total Discrepancies				\$325,524.46
Total Damages this Schedule				\$62,373.13
20% of Discrepancies				\$65,104.89
Assessed Damages				\$62,373.13

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: January 2012

Address: 4224 Foxborough Circle

Page #: 4 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 4-Jan	Ck Date 11-Jan	Ck Date 18-Jan	Ck Date 25-Jan		Total Hours			
	CASTELLANO PAUL E MT Builders	CD2	0.00	0.00	6.00	0.00	0.00	0.00		6.00		6.00	6.00
		CD41	0.00	0.00	24.50	0.00	0.00	0.00		24.50		0.00	24.50
													</

Total Items Listed in this Period: 2.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc


Month: February 2012

Address: 4224 Foxborough Circle

Page #: 5 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 1-Feb	Ck Date 8-Feb	Ck Date 15-Feb	Ck Date 22-Feb	Ck Date 29-Feb	Total Hours			
	MT Builders	CD41	0.00	0.00	85.75	0.00	0.00	0.00	0.00	85.75		0.00	85.75
	Oldcastle Building Envelope	CD41	0.00	0.00	83.75	0.00	0.00	0.00	0.00	83.75		0.00	83.75
Total					169.50	0.00	0.00	0.00	0.00	169.50		0.00	169.50

Total Items Listed in this Period: 2.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: March 2012

Address: 4224 Foxborough Circle

Page #: 6 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 7-Mar	Ck Date 14-Mar	Ck Date 21-Mar	Ck Date 28-Mar		Total Hours			
9	MT Builders	CD41	0.00	0.00	71.00	0.00	0.00	0.00		71.00		0.00	71.00
Total					71.00	0.00	0.00	0.00	0.00	71.00		0.00	71.00

Total Items Listed in this Period: 1.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: April 2012

Address: 4224 Foxborough Circle

Page #: 7 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 4-Apr	Ck Date 11-Apr	Ck Date 18-Apr	Ck Date 25-Apr					
9 13	CASTELLANO PAUL E	CD2	0.00	0.00	12.25	0.00	0.00	0.00		12.25		12.25	12.25
	CORREA LUIS A	CD2	0.00	0.00	12.25	0.00	0.00	0.00		12.25		12.25	12.25
	MT Builders	CD41	0.00	0.00	17.25	0.00	0.00	0.00		17.25		0.00	17.25
	S & S Panel	CD41	0.00	0.00	23.00	0.00	0.00	0.00		23.00		0.00	23.00
Total					64.75	0.00	0.00	0.00	0.00	64.75		24.50	64.75

Total Items Listed in this Period: 4.00



# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: May 2012

Address: 4224 Foxborough Circle  
Kankakee, IL 60901

Page #: 8 of 29

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 2-May	Ck Date 9-May	Ck Date 16-May	Ck Date 23-May	Ck Date 30-May	Total Hours			
[REDACTED]	MT Builders	CD41	0.00	0.00	159.25	0.00	0.00	0.00	0.00	159.25		0.00	159.25
	YKK - AP	CD41	0.00	0.00	341.25	0.00	0.00	0.00	0.00	341.25		0.00	341.25
Total					500.50	0.00	0.00	0.00	0.00	500.50		0.00	500.50

Total Items Listed in this Period: 2.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014


Employer: Architectural Systems Inc

Month: June 2012

Address: 4224 Foxborough Circle  
Kankakee, IL 60901

Page #: 9 of 29

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 6-Jun	Ck Date 13-Jun	Ck Date 20-Jun	Ck Date 27-Jun					
	Bridgman Dave	CD49	0.00	0.00	72.00	0.00	0.00	0.00		72.00		72.00	72.00
	MT Builders	CD41	0.00	0.00	72.25	0.00	0.00	0.00		72.25		0.00	72.25
	Tubelite Inc	CD41	0.00	0.00	67.00	0.00	0.00	0.00		67.00		0.00	67.00
	YKK - AP	CD41	0.00	0.00	34.75	0.00	0.00	0.00		34.75		0.00	34.75
Total					246.00	0.00	0.00	0.00	0.00	246.00		72.00	246.00

Total Items Listed in this Period: 4.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: July 2012

Address: 4224 Foxborough Circle

Page #: 10 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 4-Jul	Ck Date 11-Jul	Ck Date 18-Jul	Ck Date 25-Jul					
9	Bridgman Dave	CD49	0.00	0.00	96.00	0.00	0.00	0.00		96.00		96.00	96.00
	MT Builders	CD41	0.00	0.00	48.25	0.00	0.00	0.00		48.25		0.00	48.25
Total					144.25	0.00	0.00	0.00	0.00	144.25		96.00	144.25

Total Items Listed in this Period: 2.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: August 2012

Address: 4224 Foxborough Circle

Page #: 11 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 1-Aug	Ck Date 8-Aug	Ck Date 15-Aug	Ck Date 22-Aug	Ck Date 29-Aug	Total Hours			
[REDACTED]	CASTELLANO PAUL E	CD2	0.00	0.00	29.00	0.00	0.00	0.00	0.00	29.00		29.00	29.00
	MT Builders	CD41	0.00	0.00	120.50	0.00	0.00	0.00	0.00	120.50		0.00	120.50
	Tabelete JMG	CD41	0.00	0.00	696.25	0.00	0.00	0.00	0.00	696.25		0.00	696.25
Total					845.75	0.00	0.00	0.00	0.00	845.75		29.00	845.75

Total Items Listed in this Period: 3.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: September 2012

Address: 4224 Foxborough Circle

Page #: 12 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 5-Sep	Ck Date 12-Sep	Ck Date 19-Sep	Ck Date 26-Sep					
9	MT Builders	CD41	0.00	0.00	48.25	0.00	0.00	0.00		48.25		0.00	48.25
	Nelson Ann	CD49	0.00	0.00	16.25	0.00	0.00	0.00		16.25		16.25	16.25
Total					64.50	0.00	0.00	0.00	0.00	64.50		16.25	64.50

Total Items Listed in this Period: 2.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: October 2012

Address: 4224 Foxborough Circle  
Kankakee, IL 60901

Page #: 13 of 29

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 3-Oct	Ck Date 10-Oct	Ck Date 17-Oct	Ck Date 24-Oct	Ck Date 31-Oct	Total Hours			
	Bridgman Dave	CD49	0.00	0.00	25.25	0.00	0.00	0.00	0.00	25.25		25.25	25.25
	CASTELLANO PAUL E	P2	0.00	0.00	32.00	40.00	22.00	34.00	20.00	148.00		148.00	148.00
	MT Builders	CD41	0.00	0.00	108.50	0.00	0.00	0.00	0.00	108.50		0.00	108.50
	Nelson Ann	CD49	0.00	0.00	24.00	0.00	0.00	0.00	0.00	24.00		24.00	24.00
Total					189.75	40.00	22.00	34.00	20.00	305.75		197.25	305.75

Total Items Listed in this Period: 4.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: November 2012

Address: 4224 Foxborough Circle

Page #: 14 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 7-Nov	Ck Date 14-Nov	Ck Date 21-Nov	Ck Date 28-Nov					
T + T	CASTELLANO PAUL E	P2	0.00	0.00	8.00	30.00	30.00	20.00		88.00		88.00	88.00
	Kawneer Company Inc	CD41	0.00	0.00	281.00	0.00	0.00	0.00		281.00		0.00	281.00
	MT Builders	CD41	0.00	0.00	43.25	0.00	0.00	0.00		43.25		0.00	43.25
	Nelson Ann	CD49	0.00	0.00	26.00	0.00	0.00	0.00		26.00		26.00	26.00
	Oldcastle Building Envelope	CD41	0.00	0.00	152.25	0.00	0.00	0.00		152.25		0.00	152.25
	Vitralum Industries	CD41	0.00	0.00	500.00	0.00	0.00	0.00		500.00		0.00	500.00
Total					1,010.50	30.00	30.00	20.00	0.00	1,090.50		114.00	1,090.50

Total Items Listed in this Period: 6.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: December 2012

Address: 4224 Foxborough Circle

Page #: 15 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 5-Dec	Ck Date 12-Dec	Ck Date 19-Dec	Ck Date 26-Dec					
	Bridgman Dave	CD49	0.00	0.00	48.25	0.00	0.00	0.00		48.25		48.25	48.25
	CASTELLANO PAUL E	CD15	0.00	0.00	71.25	0.00	0.00	0.00		71.25		71.25	71.25
	CASTELLANO PAUL E	P8	40.00	40.00	30.00	0.00	0.00	0.00		30.00		(10.00)	(10.00)
	MT Builders	CD41	0.00	0.00	48.25	0.00	0.00	0.00		48.25		0.00	48.25
Total					197.75	0.00	0.00	0.00	0.00	197.75		109.50	157.75

Total Items Listed in this Period: 4.00



# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: January 2013

Address: 4224 Foxborough Circle  
Kankakee, IL 60901

Page #: 16 of 29

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 2-Jan	Ck Date 9-Jan	Ck Date 16-Jan	Ck Date 23-Jan	Ck Date 30-Jan	Total Hours			
[REDACTED]	CORREA LUIS A	CD2	0.00	0.00	46.25	0.00	0.00	0.00	0.00	46.25		46.25	46.25
	MT Builders	CD41	0.00	0.00	192.75	0.00	0.00	0.00	0.00	192.75		0.00	192.75
	S and S Paul	CD41	0.00	0.00	72.00	0.00	0.00	0.00	0.00	72.00		0.00	72.00
Total					311.00	0.00	0.00	0.00	0.00	311.00		46.25	311.00

Total Items Listed in this Period: 3.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: February 2013

Address: 4224 Foxborough Circle

Page #: 17 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 6-Feb	Ck Date 13-Feb	Ck Date 20-Feb	Ck Date 27-Feb					
[REDACTED]	Flynn Tim	CD49	0.00	0.00	101.75	0.00	0.00	0.00		101.75		101.75	101.75
	MT Builders	CD41	0.00	0.00	255.25	0.00	0.00	0.00		255.25		0.00	255.25
	Nelson Ann	CD49	0.00	0.00	31.75	0.00	0.00	0.00		31.75		31.75	31.75
	Oldcastle Building Envelope	CD41	0.00	0.00	29.00	0.00	0.00	0.00		29.00		0.00	29.00
	Pohl One of America	CD41	0.00	0.00	441.50	0.00	0.00	0.00		441.50		0.00	441.50
Total					859.25	0.00	0.00	0.00	0.00	859.25		133.50	859.25

Total Items Listed in this Period: 5.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: March 2013

Address: 4224 Foxborough Circle

Page #: 18 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 6-Mar	Ck Date 13-Mar	Ck Date 20-Mar	Ck Date 27-Mar					
██████████	CASTELLANO PAUL E	CD15	0.00	0.00	44.25	0.00	0.00	0.00		44.25		44.25	44.25
██████████	CASTELLANO PAUL E	P8Q	32.00	32.00	82.00	0.00	0.00	0.00		82.00		50.00	50.00
██████████	Oldcastle Building Envelope	CD41	0.00	0.00	44.00	0.00	0.00	0.00		44.00		0.00	44.00
██████████	Rice Jesse	CD49	0.00	0.00	52.00	0.00	0.00	0.00		52.00		52.00	52.00
Total					222.25	0.00	0.00	0.00	0.00	222.25		146.25	190.25

Total Items Listed in this Period: 4.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: April 2013

Address: 4224 Foxborough Circle

Page #: 19 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 3-Apr	Ck Date 10-Apr	Ck Date 17-Apr	Ck Date 24-Apr					
	Access Door Inc	CD41	0.00	0.00	37.25	0.00	0.00	0.00		37.25		0.00	37.25
	CASTELLANO PAUL E	CD15	0.00	0.00	21.75	0.00	0.00	0.00		21.75		21.75	21.75
	CASTELLANO PAUL E	P8Q	83.00	83.00	121.25	0.00	0.00	0.00		121.25		38.25	38.25
	Nelson Terry	CD49	0.00	0.00	96.25	0.00	0.00	0.00		96.25		96.25	96.25
	Oldcastle Building Envelope	CD41	0.00	0.00	59.00	0.00	0.00	0.00		59.00		0.00	59.00
	Pecnba Mike	CD49	0.00	0.00	17.25	0.00	0.00	0.00		17.25		17.25	17.25
	Rice Jesse	CD49	0.00	0.00	202.50	0.00	0.00	0.00		202.50		202.50	202.50
Total					555.25	0.00	0.00	0.00	0.00	555.25		376.00	472.25

Total Items Listed in this Period: 7.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: May 2013

Address: 4224 Foxborough Circle

Page #: 20 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 1-May	Ck Date 8-May	Ck Date 15-May	Ck Date 22-May	Ck Date 29-May				
	CASTELLANO PAUL E	CD15	0.00	0.00	15.75	0.00	0.00	0.00	0.00	15.75		15.75	15.75
	CASTELLANO PAUL E	P8Q	47.00	47.00	85.00	0.00	0.00	0.00	0.00	85.00		38.00	38.00
	Goldrag Industries	CD41	0.00	0.00	72.75	0.00	0.00	0.00	0.00	72.75		0.00	72.75
	MT Builders	CD41	0.00	0.00	72.25	0.00	0.00	0.00	0.00	72.25		0.00	72.25
	Rice Jesse	CD49	0.00	0.00	28.00	0.00	0.00	0.00	0.00	28.00		28.00	28.00
	Skyline Design	CD41	0.00	0.00	266.25	0.00	0.00	0.00	0.00	266.25		0.00	266.25
Total					540.00	0.00	0.00	0.00	0.00	540.00		81.75	493.00

Total Items Listed in this Period: 6.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: June 2013

Address: 4224 Foxborough Circle

Page #: 21 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 2-Jun	Ck Date 9-Jun	Ck Date 16-Jun	Ck Date 23-Jun	Ck Date 30-Jun				
	CASTELLANO PAUL E	P8Q	14.00	14.00	52.00	0.00	0.00	0.00	0.00	52.00		38.00	38.00
	Goldrag Industries	CD41	0.00	0.00	474.25	0.00	0.00	0.00	0.00	474.25		0.00	474.25
	MELLER DAVID W	CD2	0.00	0.00	23.50	0.00	0.00	0.00	0.00	23.50		23.50	23.50
	MT Builders	CD41	0.00	0.00	82.25	0.00	0.00	0.00	0.00	82.25		0.00	82.25
	Nelson Ann	CD49	0.00	0.00	21.50	0.00	0.00	0.00	0.00	21.50		21.50	21.50
	S and S Paul	CD41	0.00	0.00	89.25	0.00	0.00	0.00	0.00	89.25		0.00	89.25
Total					742.75	0.00	0.00	0.00	0.00	742.75		83.00	728.75

Total Items Listed in this Period: 6.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc


Month: July 2013

Address: 4224 Foxborough Circle

Page #: 22 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 3-Jul	Ck Date 10-Jul	Ck Date 17-Jul	Ck Date 24-Jul	Ck Date 31-Jul	Total Hours			
	MT Builders	CD41	0.00	0.00	23.50	0.00	0.00	0.00	0.00	23.50		0.00	23.50
	Oldcastle Building Envelope	CD41	0.00	0.00	1,647.75	0.00	0.00	0.00	0.00	1,647.75		0.00	1,647.75
	Robinson Ken	CD49	0.00	0.00	32.75	0.00	0.00	0.00	0.00	32.75		32.75	32.75
Total					1,704.00	0.00	0.00	0.00	0.00	1,704.00		32.75	1,704.00

Total Items Listed in this Period: 3.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: August 2013

Address: 4224 Foxborough Circle  
Kankakee, IL 60901

Page #: 23 of 29

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 7-Aug	Ck Date 14-Aug	Ck Date 21-Aug	Ck Date 28-Aug					
5	MT Builders	CD41	0.00	0.00	235.25	0.00	0.00	0.00		235.25		0.00	235.25
Total					235.25	0.00	0.00	0.00	0.00	235.25		0.00	235.25

Total Items Listed in this Period: 1.00



# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: September 2013

Address: 4224 Foxborough Circle

Page #: 24 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 4-Sep	Ck Date 11-Sep	Ck Date 18-Sep	Ck Date 25-Sep					
	MT Builders	CD41	0.00	0.00	23.50	0.00	0.00	0.00		23.50		0.00	23.50
	Oldcastle Building Envelope	CD41	0.00	0.00	935.50	0.00	0.00	0.00		935.50		0.00	935.50
Total					959.00	0.00	0.00	0.00	0.00	959.00		0.00	959.00

Total Items Listed in this Period: 2.00

# Monthly Detail Report

Account Number: 21403

Audit Period:

January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month:

October 2013

Address: 4224 Foxborough Circle

Page #:

25 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 9-Oct	Ck Date 16-Oct	Ck Date 23-Oct	Ck Date 30-Oct					
[REDACTED]	CASTELLANO PAUL E	P2	0.00	0.00	20.00	24.00	16.00	24.00		84.00		84.00	84.00
	MT Builders	CD41	0.00	0.00	164.75	0.00	0.00	0.00		164.75		0.00	164.75
	Oldcastle Building Envelope	CD41	0.00	0.00	78.00	0.00	0.00	0.00		78.00		0.00	78.00
Total					262.75	24.00	16.00	24.00	0.00	326.75		84.00	326.75

Total Items Listed in this Period: 3.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: November 2013

Address: 4224 Foxborough Circle

Page #: 26 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 6-Nov	Ck Date 13-Nov	Ck Date 20-Nov	Ck Date 27-Nov					
	CASTELLANO PAUL E	P1	40.00	40.00	24.00	40.00	20.00	25.00		109.00		69.00	69.00
	CORREA LUIS A	P1	40.00	40.00	0.00	0.00	19.00	25.00		44.00		4.00	4.00
	IAP Enclosure	CD41	0.00	0.00	47.00	0.00	0.00	0.00		47.00		0.00	47.00
	MELLER DAVID W	P1	36.00	36.00	0.00	0.00	14.00	37.00		51.00		15.00	15.00
	MT Builders	CD41	0.00	0.00	70.50	0.00	0.00	0.00		70.50		0.00	70.50
	Oldcastle Building Envelope	CD41	0.00	0.00	754.75	0.00	0.00	0.00		754.75		0.00	754.75
Total					896.25	40.00	53.00	87.00	0.00	1,076.25		88.00	960.25

Total Items Listed in this Period: 6.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: December 2013

Address: 4224 Foxborough Circle

Page #: 27 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 4-Dec	Ck Date 11-Dec	Ck Date 18-Dec	Ck Date 24-Dec	Ck Date 31-Dec	Total Hours			
	CASTELLANO PAUL E	P1	48.00	48.00	24.00	34.00	24.00	32.00	16.00	130.00		82.00	82.00
	COATAR JAMES R	P2	0.00	0.00	0.00	0.00	0.00	0.00	10.00	10.00		10.00	10.00
	CORREA LUIS A	P1	48.00	48.00	21.00	37.50	24.00	8.00	19.00	109.50		61.50	61.50
	MELLER DAVID W	P1	60.00	60.00	20.00	40.00	36.00	35.00	16.00	147.00		87.00	87.00
	MT Builders	CD41	0.00	0.00	152.75	0.00	0.00	0.00	0.00	152.75		0.00	152.75
	Oldcastle Building Envelope	CD41	0.00	0.00	390.75	0.00	0.00	0.00	0.00	390.75		0.00	390.75
Total					608.50	111.50	84.00	75.00	61.00	940.00		240.50	784.00

Total Items Listed in this Period: 6.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc  
 Address: 4224 Foxborough Circle  
 Kankakee, IL 60901

Month: January 2014

Page #: 28 of 29

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 8-Jan	Ck Date 15-Jan	Ck Date 22-Jan	Ck Date 29-Jan					
██████████	CASTELLANO PAUL E	P1	76.00	76.00	16.00	25.00	28.00	16.00		85.00		9.00	9.00
██████████	COATAR JAMES R	P1	30.00	30.00	14.00	15.00	15.00	4.00		48.00		18.00	18.00
██████████	CORREA LUIS A	P1	72.00	72.00	15.00	26.00	35.00	16.00		92.00		20.00	20.00
██████████	Dore Dan	CD49	0.00	0.00	8.75	0.00	0.00	0.00		8.75		8.75	8.75
██████████	GS-MBE	CD41	0.00	0.00	134.00	0.00	0.00	0.00		134.00		0.00	134.00
██████████	MELLER DAVID W	P1	71.00	71.00	19.00	19.00	30.00	16.00		84.00		13.00	13.00
██████████	MT Builders	CD41	0.00	0.00	47.00	0.00	0.00	0.00		47.00		0.00	47.00
Total					253.75	85.00	108.00	52.00	0.00	498.75		68.75	249.75

Total Items Listed in this Period: 7.00

# Monthly Detail Report

Account Number: 21403

Audit Period: January 1, 2012 to March 31, 2014

Employer: Architectural Systems Inc

Month: February 2014

Address: 4224 Foxborough Circle

Page #: 29 of 29

Kankakee, IL 60901

Phone: (847) 639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					Ck Date 5-Feb	Ck Date 12-Feb	Ck Date 19-Feb	Ck Date 26-Feb					
	COATAR JAMES R	CD15	0.00	0.00	19.75	0.00	0.00	0.00		19.75		19.75	19.75
	COATAR JAMES R	P1	7.00	7.00	4.00	0.00	0.00	3.00		7.00		0.00	0.00
	Commercial Door Systems	CD41	0.00	0.00	117.75	0.00	0.00	0.00		117.75		0.00	117.75
	CORREA LUIS A	CD15	0.00	0.00	23.25	0.00	0.00	0.00		23.25		23.25	23.25
	CORREA LUIS A	P1	41.00	41.00	6.00	6.00	6.00	23.00		41.00		0.00	0.00
	Gutierrez Blanca	CD49	0.00	0.00	109.50	0.00	0.00	0.00		109.50		109.50	109.50
	Hronch Tim	CD49	0.00	0.00	27.75	0.00	0.00	0.00		27.75		27.75	27.75
	MELLER DAVID W	P1	41.00	41.00	6.00	6.00	14.00	23.00		49.00		8.00	8.00
	MELLER DAVID W	CD15	0.00	0.00	6.25	0.00	0.00	0.00		6.25		6.25	6.25
	MT Builders	CD41	0.00	0.00	117.50	0.00	0.00	0.00		117.50		0.00	117.50
	Nelson Ann	CD49	0.00	0.00	13.75	0.00	0.00	0.00		13.75		13.75	13.75
	R & D Custom Home	CD41	0.00	0.00	17.75	0.00	0.00	0.00		17.75		0.00	17.75
Total					469.25	12.00	20.00	49.00	0.00	550.25		208.25	461.25

Total Items Listed in this Period: 12.00

**14 CV 03738**

**Exhibit B-3**

Discrepancy Summary By Month									
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Account Number:	21403	Audit Period:	Jan 12 - Mar 14
Employer:	Architectural Systems Inc	Contact:	Jim Chavez
Address:	4224 Foxborough Circle Kankakee, IL 60901	Title:	President
Phone:	847-639-8484	Page:	1 of 9

[illegible]



## Discrepancy Summary By Error Type

Account Number:	21403	Audit Period:	Jan 12 - Mar 14
Employer:	Architectural Systems Inc	Contact:	Jim Chavez
Address:	4224 Foxborough Circle	Title:	President
	Kankakee, IL 60901		
Phone:	847-639-8484	Page:	2 of 9

Code	Description	Dollar Amount
<b>SIGNATORY EMPLOYER: PAYROLL</b>		
P1	Clerical Error	\$10,385.26
P2	Prior to Hours	\$268.70
<b>SIGNATORY EMPLOYER: CASH DISBURSEMENTS</b>		
CD2	Paid through Cash Disbursements - Prior to Hours	\$631.45
CD15	Additional Pay	\$1,323.35
CD49	No-Record Individual Performing Carpentry Work	\$2,611.92
Sub-Total Discrepancies From All Listed Codes		\$15,220.68
Liquidated Damages		\$3,003.05
Total Amount Due		\$18,223.73

# Liquidated Damages Schedule

Account Number:	21403	Audit Period:	Jan 12 - Mar 14
Employer:	Architectural Systems Inc	Contact:	Jim Chavez
Address:	4224 Foxborough Circle	Title:	President
	Kankakee, IL 60901		
Phone:	847-639-8484	Page:	3 of 9

Reporting Period	Contributions Due	Compounding Periods	Calculating Percentage	Total Liquidated Damages Owed
February 2013	\$2,611.92	23.00	20.00%	\$522.38
June 2013	\$631.45	19.00	20.00%	\$126.29
November 2013	\$2,364.56	14.00	20.00%	\$472.91
December 2013	\$6,462.24	13.00	20.00%	\$1,292.45
January 2014	\$1,612.20	12.00	19.56%	\$315.35
February 2014	\$1,538.31	11.00	17.79%	\$273.67
Total Discrepancies				\$15,220.68
Total Damages this Schedule				\$3,003.05
20% of Discrepancies				\$3,044.14
Assessed Damages				\$3,003.05

# Monthly Detail Report

Account Number: 21403

Audit Period: Jan 12 - Mar 14

Employer: Architectural Systems Inc

Month: February 2013

Address: 4224 Foxborough Circle

Page #: 4 of 9

Kankakee, IL 60901

Phone: 847-639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 06-Feb	W/E 13-Feb	W/E 20-Feb	W/E 27-Feb					
<del>XXXXXXXXXX</del>	Flynn, Tim	CD49	0.00	0.00	101.75					101.75		101.75	101.75
Total					101.75	0.00	0.00	0.00	0.00	101.75		101.75	101.75

Total Items Listed in this Period: 1.00

# Monthly Detail Report

Account Number: 21403

Audit Period: Jan 12 - Mar 14

Employer: Architectural Systems Inc

Month: June 2013

Address: 4224 Foxborough Circle

Page #: 5 of 9

Kankakee, IL 60901

Phone: 847-639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 02-Jun	W/E 09-Jun	W/E 16-Jun	W/E 23-Jun	W/E 30-Jun	Total Hours			
██████████	Meller, David	CD2	0.00	0.00	23.50	0.00	0.00	0.00	0.00	23.50		23.50	23.50
Total					23.50	0.00	0.00	0.00	0.00	23.50		23.50	23.50

Total Items Listed in this Period: 1.00

# Monthly Detail Report

Account Number: 21403

Audit Period: Jan 12 - Mar 14

Employer: Architectural Systems Inc

Month: November 2013

Address: 4224 Foxborough Circle

Page #: 6 of 9

Kankakee, IL 60901

Phone: 847-639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 06-Nov	W/E 13-Nov	W/E 20-Nov	W/E 27-Nov					
██████████	Castellano, Paul	P1	40.00	40.00	24.00	40.00	20.00	25.00		109.00		69.00	69.00
██████████	Correa, Luis	P1	40.00	40.00	0.00	0.00	19.00	25.00		44.00		4.00	4.00
██████████	Meller, David	P1	36.00	36.00	0.00	0.00	14.00	37.00		51.00		15.00	15.00
Total					24.00	40.00	53.00	87.00	0.00	204.00		88.00	88.00

Total Items Listed in this Period: 3.00

# Monthly Detail Report

Account Number: 21403

Audit Period: Jan 12 - Mar 14

Employer: Architectural Systems Inc


Month: December 2013

Address: 4224 Foxborough Circle

Page #: 7 of 9

Kankakee, IL 60901

Phone: 847-639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 04-Dec	W/E 11-Dec	W/E 18-Dec	W/E 25-Dec	W/E 31-Dec	Total Hours			
	Castellano, Paul	P1	48.00	48.00	24.00	34.00	24.00	32.00	16.00	130.00		82.00	82.00
	Coatar, James	P2	0.00	0.00	0.00	0.00	0.00	0.00	10.00	10.00		10.00	10.00
	Correa, Luis	P1	48.00	48.00	21.00	37.50	24.00	8.00	19.00	109.50		61.50	61.50
	Meller, David	P1	60.00	60.00	20.00	40.00	36.00	35.00	16.00	147.00		87.00	87.00
Total					65.00	111.50	84.00	75.00	61.00	396.50		240.50	240.50

Total Items Listed in this Period: 4.00

# Monthly Detail Report

Account Number: 21403

Audit Period: Jan 12 - Mar 14

Employer: Architectural Systems Inc





Month: January 2014

Address: 4224 Foxborough Circle

Page #: 8 of 9

Kankakee, IL 60901

Phone: 847-639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 06-May	W/E 13-May	W/E 20-May	W/E 27-May					
	Castellano, Paul	P1	76.00	76.00	16.00	25.00	28.00	16.00		85.00		9.00	9.00
	Coatar, James	P1	30.00	30.00	14.00	15.00	15.00	4.00		48.00		18.00	18.00
	Correa, Luis	P1	72.00	72.00	15.00	26.00	35.00	16.00		92.00		20.00	20.00
	Meller, David	P1	71.00	71.00	19.00	19.00	30.00	16.00		84.00		13.00	13.00
Total					64.00	85.00	108.00	52.00	0.00	309.00		60.00	60.00

Total Items Listed in this Period: 4.00

# Monthly Detail Report

Account Number: 21403

Audit Period: Jan 12 - Mar 14

Employer: Architectural Systems Inc


Month: February 2014

Address: 4224 Foxborough Circle

Page #: 9 of 9

Kankakee, IL 60901

Phone: 847-639-8484

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 05-Feb	W/E 12-Feb	W/E 19-Feb	W/E 26-Feb					
	Coatar, James	CD15	0.00	0.00	19.75	0.00	0.00	0.00		19.75		19.75	19.75
	Coatar, James	P1	7.00	7.00	4.00	0.00	0.00	3.00		7.00		0.00	0.00
	Correa, Luis	CD15	0.00	0.00	23.25	0.00	0.00	0.00		23.25		23.25	23.25
	Correa, Luis	P1	41.00	41.00	6.00	6.00	6.00	23.00		41.00		0.00	0.00
	Meller, David	CD15	0.00	0.00	6.25	0.00	0.00	0.00		6.25		6.25	6.25
	Meller, David	P1	41.00	41.00	6.00	6.00	14.00	23.00		49.00		8.00	8.00
Total					65.25	12.00	20.00	49.00	0.00	146.25		57.25	57.25

Total Items Listed in this Period: 6.00



**14 CV 03738**

**Exhibit B-4**

## Interest & Damages Summary

Account Number: 21403

Calculation Date: February 20, 2015

Employer: Architectural Systems Inc  
Address: 4224 Foxborough Circle  
Kankakee, IL 60901

Reporting Period	Delinquency Amount	Interest	Liquidated Damages	Total Due
February 2013	\$2,611.92	\$156.84	\$522.38	\$3,291.14
June 2013	\$631.45	\$31.26	\$126.29	\$789.00
November 2013	\$2,364.56	\$86.31	\$472.91	\$2,923.78
December 2013	\$6,462.24	\$219.12	\$1,292.45	\$7,973.81
January 2014	\$1,612.20	\$50.19	\$315.35	\$1,977.74
February 2014	\$1,538.31	\$44.26	\$273.67	\$1,856.24
Totals	\$15,220.68	\$587.98	\$3,003.05	\$18,811.71

**14 CV 03738**

**Exhibit C**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF	)	
CARPENTERS PENSION FUND, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	14 CV 03738
v.	)	
	)	
ARCHITECTURAL SYSTEMS, INC., an	)	Judge Lee
Illinois corporation,	)	
	)	
Defendant.	)	

**DECLARATION OF KEVIN P. MCJESSY**

I, Kevin P. McJessey, hereby declare, under penalty of perjury pursuant to the laws of the United States, that the following statements are true:

1. I am one of the attorneys representing the Chicago Regional Council of Carpenters Pension Fund, the Chicago Regional Council of Carpenters Welfare Fund, the Chicago and Northeast Illinois Regional Council of Carpenter Apprentice and Trainee Program, and the Labor/Management Union Carpentry Cooperation Promotion Fund (collectively “the Trust Funds”) in the above-captioned lawsuit (“Lawsuit”) against ARCHITECTURAL SYSTEMS, INC., an Illinois corporation (“Defendant”).

2. I have been licensed to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois since 1995. I am an attorney with McJessey, Ching & Thompson, LLC (“MC&T”).

3. As part of my practice, I handle claims under ERISA. I personally represented the Trust Funds in this Lawsuit. I have represented the Trust Funds in this Lawsuit since its inception.

4. The Trust Funds have incurred \$5,772.40 in fees and expenses to compel Defendant to comply with its obligations under the terms of the Collective Bargaining Agreement and applicable trust agreements. A redacted copy of the billing statement from MC&T from the inception of this Lawsuit to the present, redacted to protect privileged communications, is attached as Exhibit C-1. The detailed billing statement describes in detail all work performed by MC&T in this matter.

a) The Trust Funds have collectively incurred fees totaling \$4,592.00 for 28.7 hours of attorney services. The substantially reduced hourly rate for attorneys at MC&T for Trust Funds matters is \$160.00 per hour.

b) The Trust Funds have collectively incurred fees totaling \$246.00 for 4.1 hours of paralegal time. The substantially reduced hourly rate for paralegals at MC&T for Trust Fund matters is \$60.00 per hour.

c) The Trust Funds incurred \$934.40 in expenses for the filing fee, process servers, legal research charge, courier charges, postage and photocopy charges.

5. The attorneys' fees, paralegal fees and costs charged to the Trust Funds in this matter are consistent with MC&T's regular charges for services to the Trust Funds on similar matters and are substantially reduced from MC&T for other clients.

6. I have personal knowledge of the matters stated in this affidavit and could testify competently to them.

FURTHER AFFIANT SAYETH NOT.

  
Kevin P. McJessey

2/20/15  
Date

**14 CV 03738**

**Exhibit C-1**

Client Ledger

ALL DATES

Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld	----- Trust Activity -----			
Entry #	Explanation	Rec#	Rcpts	Disbs		Inv#	Acc	Rcpts	Disbs	Balance
1000	Chicago Regional Council of Carpenters -									
0211-ARCH	Architectural Systems, Inc.									
Mar 19/2014	Lawyer: KM 0.70 Hrs X 160.00									
81586	Telephone call from N. Wu regarding arrangements for audit demand letter. (.2)				112.00	8303				
	Reviewed and responded to correspondence from N. Wu regarding request for final demand letter to Architectural Systems. (.1) Reviewed Illinois Secretary of State records for status of Architectural Systems, current officers and addresses; prepared audit demand letter to Architectural Systems. (.4)									
Apr 1/2014	Lawyer: KM 0.10 Hrs X 160.00				16.00	8371				
82170	Reviewed and responded to correspondence from N. Wu advising he has not been contacted by Architectural Systems, Inc. and he is returning audit as no audit / no cooperation.									
Apr 10/2014	Billing on Invoice 8303									
81921	FEES 112.00			0.00		8303				
Apr 21/2014	Chicago Regional Council of Carpe									
81993	PMT -	01464	112.00							
May 8/2014	Lawyer: KM 0.10 Hrs X 160.00				16.00	8459				
82732	Reviewed correspondence from M. Ragona regarding uploading of Architectural Systems report to portal.									
May 12/2014	Lawyer: KM 0.10 Hrs X 160.00				16.00	8459				
82164	Download audit report from Legacy Professionals' portal and reviewed audit report for no audit/no cooperation.									
May 19/2014	Billing on Invoice 8371									
82540	FEES 16.00			0.00		8371				
May 20/2014	Lawyer: SK 0.20 Hrs X 60.00				12.00	8459				
82553	Prepared summons, civil cover sheet and K. McJessy appearance.									
May 21/2014	Lawyer: SK 0.60 Hrs X 60.00				36.00	8459				
82555	Filed complaint, civil cover sheet and K. McJessy appearance with court; reviewed court notice re: judges assignments and completed summons as appropriate; prepared email correspondence to court intake clerk forwarding summons for issuance; prepared correspondence to Judge Lee forwarding courtesy copy of complaint; prepared email correspondence to process server forwarding summons and complaint for service.									
May 21/2014	Lawyer: KM 1.60 Hrs X 160.00				256.00	8459				
82846	Reviewed audit referral file from Trust Funds. Prepared complaint against Architectural Systems for failing to comply with audit demands. Reviewed summons, appearance and civil cover forms prior to filing of same.									
May 23/2014	Lawyer: KM 0.10 Hrs X 160.00				16.00	8459				
82868	Reviewed ECF court order of Judge Lee setting initial status hearing for 7/15/14 and initial status report requirement.									
May 30/2014	Lawyer: SK 0.20 Hrs X 60.00				12.00	8459				
82614	Reviewed process server's affidavit of service of summons and complaint and filed same electronically with court.									
May 31/2014	Expense Recovery									
82634	Photocopy Recovery	00288		4.56		8459				
May 31/2014	Midwest Investigations									
82909	Process Server recovery -	4395		125.00		8459				
	Service of Summons and Complaint									
Jun 1/2014	Lawyer: KM 0.40 Hrs X 160.00				64.00	8508				
82619	Reviewed correspondence from N.									

Resp Lawyer: KM

## Client Ledger

ALL DATES

Date	Received From/Paid To	Chq#	General	Bld	Trust Activity	
Entry #	Explanation	Rec#	Rpts Disbs	Inv# Acc	Rpts Disbs	Balance
	Wu regarding contact from Architectural Systems on 5/30/14 and setting up appointment. (.1) Reviewed file materials for status of service of complaint; reviewed affidavit of service complaint served on 5/27/14. (.2) Prepared correspondence to N. Wu advising of status of litigation and appointment was almost certainly the result of Architectural Systems getting sued. (.1)					
Jun 2/2014	Lawyer: KM 0.20 Hrs X 160.00					
83512	Reviewed correspondence from N. Wu regarding confirmation that on 5/30/14 Architectural Systems made arrangements for an audit. Reviewed records for affidavit of service. Responded to correspondence from N. Wu confirming appointment with Architectural Systems and advising that Architectural Systems was served on 5/27/14 and that is why Legacy received the call to set up the appointment on 5/30/14.			32.00	8508	
Jun 3/2014	Lawyer: KM 0.10 Hrs X 160.00					
83575	Prepared correspondence to defendant forwarding court order.			16.00	8508	
Jun 3/2014	Lawyer: KM 0.10 Hrs X 160.00					
83576	Reviewed correspondence from N. Wu confirming appointment set by James Chavez of Architectural Systems for audit on 6/24/14.			16.00	8508	
Jun 6/2014	Chicago Regional Council of Carpe					
82930	PMT -	01476	16.00			
Jun 9/2014	Billing on Invoice 8459					
83183	FEES 364.00 DISBS 129.56			0.00	8459	
Jun 19/2014	US Messenger & Logistics					
83267	Courier Recovery	4402	14.60		8508	
Jun 20/2014	Chicago Regional Council of Carpe					
83312	PMT -	01486	493.56			
Jun 23/2014	Lawyer: KM 0.10 Hrs X 160.00					
83734	Reviewed correspondence from N. Wu confirming field appointment has been rescheduled to July 1, 2014 at request of J. Chavez.			16.00	8508	
Jun 26/2014	Capital One Services					
83370	Filing Fee -	4406	400.00		8508	
Jun 30/2014	Lawyer: KM 0.10 Hrs X 160.00					
83770	Reviewed correspondence from N. Wu confirming audit appointment for 7/1/14.			16.00	8508	
Jul 7/2014	Lawyer: KM 0.20 Hrs X 160.00					
84221	Telephone call from N. Wu confirming some documents still missing from audit; will prepare and forward follow up record request to the company today with copy to KPM. (.1) Reviewed correspondence from N. Wu forwarding record request to J. Chavez; reviewed record request. (.1)			32.00	8575	
Jul 8/2014	Lawyer: SK 0.20 Hrs X 60.00					
83455	Filed initial status report with court and prepared correspondence to Judge Lee forwarding courtesy copy of same.			12.00	8575	
Jul 8/2014	Lawyer: KM 0.50 Hrs X 160.00					
83459	Reviewed Judge Lee's website for status report requirements. Reviewed file for status of appearance by Architectural Systems. Prepared initial status report.			80.00	8575	
Jul 14/2014	Lawyer: SK 0.20 Hrs X 60.00					
83546	Confer with Judge Lee's clerk regarding placing CRCC case at start of call due to conflict with Judge Gettleman - matter continued to 8/20/14; confer with J. Chavez of			12.00	8575	



Date		Received From/Paid To Explanation	Chq# Rec#	----- General -----		Fees	Bld  ----- Trust Activity -----		Balance
Entry #				Rcpts	Disbs		Inv#	Acc	
		Architectural Systems regarding same - Chavez says he has only few documents remaining to get to auditor N. Wu and then everything should be completed.							
Jul 15/2014	84279	Lawyer: KM 0.10 Hrs X 160.00 Reviewed ECF court order of Judge Lee resetting court hearing date to 8/20/14.				16.00	8575		
Jul 17/2014	83636	US Messenger & Logistics Courier Recovery	4427		14.60		8575		
Jul 18/2014	83834	Billing on Invoice 8508 FEES 160.00 DISBS 414.60			0.00		8508		
Jul 18/2014	84301	Lawyer: KM 0.10 Hrs X 160.00 Reviewed correspondence from N. Wu advising that Architectural Systems, Jim Chavez, is working to produce records, next production due 7/31/14.				16.00	8575		
Jul 31/2014	84088	Expense Recovery Photocopy Recovery	00293		1.20		8575		
Jul 31/2014	84119	US Messenger & Logistics Courier Recovery	4440		14.60		8575		
Aug 1/2014	84833	Lawyer: KM 0.50 Hrs X 160.00 Reviewed and responded to correspondence from N. Wu forwarding record request to Architectural Systems and briefly reviewed record request. (.1) Telephone call with Dan Jancich following up on Nick Wu's audit and learning that Architectural systems has not produced all documents requested in audit process and password and login information provided by Architectural Systems for payroll account. (.4)				80.00	8629		
Aug 8/2014	84886	Lawyer: KM 0.30 Hrs X 160.00 Started drafting motion for entry of default order.				48.00	8629		
Aug 15/2014	84492	Billing on Invoice 8575 FEES 168.00 DISBS 30.40			0.00		8575		
Aug 19/2014	84608	Chicago Regional Council of Carpe PMT -	01510	574.60					
Aug 19/2014	85005	Lawyer: KM 1.40 Hrs X 160.00 Reviewed file materials regarding status of Defendants' compliance with audit, compliance delayed. (.2) Prepared declaration of J. Libby in support of motion for entry of default judgment. (.4) Completed drafting motion for entry of default order; reviewed file materials as necessary to prepare deposition order. (.5) Drafted proposed order for entry of default. (.3)				224.00	8629		
Aug 20/2014	84580	Lawyer: SK 0.60 Hrs X 60.00 Reviewed Judge Lee's website for current motion schedule and courtesy copy requirements; prepared notice of motion for Trust Funds' motion for entry of an order of default; filed motion for entry of order of default with court; filed notice of motion with court; prepared correspondence to Judge Lee forwarding courtesy copies of same.				36.00	8629		
Aug 20/2014	84665	Lawyer: KM 1.10 Hrs X 160.00 Appeared in court before Judge Lee for status hearing on progress of audit and appearance of Defendant, defendant has not appeared likely to file motion for default by tomorrow. Reviewed ECF court order of Judge Lee ordering that motion for default be filed by 8/21/14.				176.00	8629		
Aug 20/2014	84780	Expense Recovery Postage Recovery	00295		1.61		8629		

## Client Ledger

ALL DATES

Date	Received From/Paid To	Chq#	General	Bld	Trust Activity	
Entry #	Explanation	Rec#	Rpts Disbs	Inv# Acc	Rpts Disbs	Balance
Aug 25/2014	Lawyer: KM 0.20 Hrs X 160.00					
84936	Reviewed correspondence from N. Wu advising that he has not received most recently requested documents from J. Chavez, no response and forwarding copy of most recent record request; reviewed record request.			32.00	8629	
Aug 27/2014	Lawyer: KM 0.10 Hrs X 160.00					
84686	Telephone call with N. Wu regarding Architectural Systems not producing records, advised him that matter is set for default judgment on 9/2/14 and will send order along with 8/25/14 record request to Architectural Systems once court enters the order.			16.00	8629	
Aug 29/2014	Chicago Regional Council of Carpe					
84735	PMT -	01518	198.40			
Aug 31/2014	Expense Recovery					
84772	Photocopy Recovery	00294	11.52		8629	
Sep 2/2014	Lawyer: KM 1.30 Hrs X 160.00					
85426	Appeared in court before Judge Lee for hearing on Trust Funds' motion for entry of default judgment, motion granted. Reviewed ECF court order of Judge Lee entering default order.			208.00	8690	
Sep 4/2014	Lawyer: KM 0.10 Hrs X 160.00					
85440	Reviewed correspondence from C. Acevedo seeking word version of proposed order of default.			16.00	8690	
Sep 5/2014	Expense Recovery					
85362	Postage Recovery	00296	7.80		8690	
Sep 5/2014	Lawyer: KM 0.40 Hrs X 160.00					
85457	Prepared correspondence to J. Chavez forwarding Order of Default entered against Architectural Systems and advising of requirements for compliance and consequences of noncompliance.			64.00	8690	
Sep 16/2014	Billing on Invoice 8629					
85031	FEES 612.00		0.00		8629	
	DISBS 13.13					
Sep 24/2014	Lawyer: KM 0.10 Hrs X 160.00					
85588	Telephone call from N. Wu regarding no word from Architectural Systems about audit despite court order.			16.00	8690	
Sep 24/2014	Lawyer: KM 0.50 Hrs X 160.00					
85592	Started drafting motion for rule to show cause for failing to cooperate with the auditor.			80.00	8690	
Sep 25/2014	Expense Recovery					
85350	Postage Recovery	00296	1.61		8690	
Sep 25/2014	Lawyer: KM 0.70 Hrs X 160.00					
85598	Completed motion for rule to show cause; edited and revised same prior to filing; reviewed file materials for exhibits to motion.			112.00	8690	
Sep 25/2014	Lawyer: SK 0.50 Hrs X 60.00					
85651	Prepared notice of motion for rule to show cause; filed notice and motion for rule to show cause with court; prepared correspondence to Judge Lee forwarding courtesy copies of same.			30.00	8690	
Sep 26/2014	US Messenger & Logistics					
85197	Courier Recovery	4480	14.60		8690	
Sep 30/2014	US Messenger & Logistics					
85264	Courier Recovery	4490	14.60		8690	
Sep 30/2014	Expense Recovery					
85381	Photocopy Recovery	00297	12.24		8690	
Oct 2/2014	Lawyer: KM 1.90 Hrs X 160.00					
86019	Appeared in court before Judge Lee regarding hearing on motion for rule to show cause; hearing date set for 11/5/14. (1.5) Filled in hearing date in proposed draft order; reviewed Judge Lee's policy for submitting online order and submitted proposed draft order to Judge Lee's online submission email. (.3)			304.00	8754	

## Client Ledger

ALL DATES

Date Entry #	Received From/Paid To Explanation	Chq# Rec#	----- General -----		Fees	Bld  ----- Trust Activity -----	
			Rcpts	Disbs		Inv#	Acc
	Reviewed ECF court order of Judge Lee setting show cause hearing for 11/5/14 and proposed order submission. (.1)						
Oct 6/2014 85340	Chicago Regional Council of Carpe PMT -	01524	625.13				
Oct 6/2014 86038	Lawyer: KM 0.50 Hrs X 160.00 Briefly reviewed Lexis report on J. Chavez regarding confirmation of where he is in light of need to serve order and in light of ongoing failure to acknowledge lawsuit; confirmed his address. (.2) Prepared correspondence to J. Chavez forwarding court order and explaining implications if he ignores the order. (.3)				80.00	8754	
Oct 14/2014 85398	Lawyer: SK 0.40 Hrs X 60.00 Prepared notice of filing of affidavit of service of 10/2/14 court order and 10/7/14 McJessy transmittal letter; prepared correspondence to Judge Lee forwarding courtesy copy of same.				24.00	8754	
Oct 20/2014 85672	Billing on Invoice 8690 FEES 526.00 DISBS 50.85			0.00		8690	
Oct 30/2014 85866	Midwest Investigations Process Server recovery - Service of Rule to Show Cause Order and McJessy letter	4505		105.00		8754	
Oct 31/2014 85893	Expense Recovery Photocopy Recovery	00298		1.68		8754	
Nov 4/2014 85931	Lawyer: SK 0.40 Hrs X 60.00 Prepared appearance of J. Sopata; filed Sopata appearance with court; prepared correspondence to Judge Lee forwarding courtesy copy of Sopata appearance.				24.00	8826	
Nov 4/2014 86747	Lawyer: JS 0.20 Hrs X 160.00 Prepare for 11/5/14 rule to show cause hearing.				32.00	8826	
Nov 4/2014 86913	Lawyer: KM 0.40 Hrs X 160.00 Confer with J. Sopata regarding [REDACTED] [REDACTED] [REDACTED]				64.00	8826	
Nov 5/2014 86618	Lawyer: KM 0.40 Hrs X 160.00 Prepared letter to defendant forwarding show cause letter. (.3) Reviewed ECF court order of Judge Lee on motion for rule to show cause, continued, new date 11/18/14, body attachment denied, potential fine imposed; confer with S. Keating regarding [REDACTED]. (.1)				64.00	8826	
Nov 5/2014 86749	Lawyer: JS 1.50 Hrs X 160.00 Attend rule to show cause hearing at which judge entered and continued motion and ordered fine for non-compliance.				240.00	8826	
Nov 6/2014 85938	Lawyer: SK 0.20 Hrs X 60.00 Reviewed Lexis report on J. Chavez and prior affidavit of service and prepared detailed email correspondence to process server forwarding 11/5/14 court order and McJessy 11/6/14 letter concerning continued rule to show cause.				12.00	8826	
Nov 12/2014 86030	Lawyer: KM 0.90 Hrs X 160.00 Telephone call from Graham Hartung (815) 275-0189 regarding representation of Architectural Systems, will be in court on 11/18/14, discussed background of litigation and need for audit compliance, GH's belief that Brett Haddix is scheduled to audit on				144.00	8826	

McJessy, Ching & Thompson, LLC  
Client Ledger  
ALL DATES

Date	Entry #	Received From/Paid To Explanation	Chq# Rec#	General	Disbs	Fees	Bld Inv#	Trust Activity	Balance
				Ropts			Acc	Ropts Disbs	
		Friday and possible second lawsuit and forwarded information by email to GH regarding audit. (.5) Telephone call with M. Ragona regarding status of audit, audit switched from N. Wu to B. Haddix at request of owner of Architectural Systems. (.2) Telephone call with G. Hartung following up on earlier call to confirm audit situation. (.1) Telephone call with J. Conklin [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] (.1)							
Nov 13/2014	86095	Lawyer: KM 0.20 Hrs X 160.00 Telephone call from B. Haddix regarding rescheduling of audit from tomorrow to 11/14/14 at J. Chavez's request.				32.00	8826		
Nov 13/2014	86122	US Messenger & Logistics Courier Recovery	4523		14.60		8826		
Nov 14/2014	86246	Chicago Regional Council of Carpe PMT -	01537	576.85					
Nov 14/2014	86256	Lawyer: SK 0.40 Hrs X 60.00 Reviewed process server's affidavit of service upon J. Chavez of continued rule to show cause and K. McJessy correspondence; prepared notice of filing for same and filed same electronically with court; prepared correspondence to Judge Lee forwarding courtesy copy of same.				24.00	8826		
Nov 14/2014	86307	Billing on Invoice 8754 FEES 408.00 DISBS 106.68			0.00		8754		
Nov 14/2014	86766	Lawyer: KM 0.10 Hrs X 160.00 Reviewed proof of service of Rule to Show Cause hearing on Architectural Systems.				16.00	8826		
Nov 17/2014	86781	Lawyer: KM 0.40 Hrs X 160.00 Telephone call from J. Chavez and B. Haddix and Graham Hartung regarding results of audit and hearing set for tomorrow.				64.00	8826		
Nov 18/2014	86790	Lawyer: KM 2.30 Hrs X 160.00 Appeared in court for 2:00 PM hearing on rule to show cause motion, appearance of defendant at hearing and Defendant has cooperated with the auditor yesterday and post-hearing conference with representative of Architectural Systems and its counsel, what to expect from audit, how to respond to audit once it is completed--i.e., directly to J. Conklin, Trust Funds--in order to limit attorneys' fees and costs, and likely will be substantial findings based on limited invoices produced.. (2.2) Reviewed and responded to correspondence from Graham Hartong regarding meeting after court. (.1)				368.00	8826		
Nov 20/2014	86811	Lawyer: KM 0.10 Hrs X 160.00 Reviewed ECF court order of Judge Lee, audit report to be produced by 12/12/14 and status hearing set for 12/15/14.				16.00	8826		
Nov 21/2014	86489	Chicago Regional Council of Carpe PMT -	01540	514.68					
Nov 30/2014	86649	US Messenger & Logistics Courier Recovery	4538		14.60		8826		
Nov 30/2014	86651	US Messenger & Logistics Courier Recovery	4538		14.60		8826		



McJessy, Ching & Thompson, LLC

## Client Ledger

ALL DATES

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Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld	----- Trust Activity -----			
Entry #	Explanation	Rec#	Rpts	Disbs		Inv#	Acc	Rpts	Disbs	Balance
87978	Appeared in court for status hearing before Judge Lee; audit nearly complete.				224.00	8955				
Jan 20/2015	Lawyer: SK 0.20 Hrs X 60.00									
87479	Prepared email correspondence to Judge Dow clerk concerning ECF notice that case was terminated 1/15/15.				12.00	8955				
Jan 20/2015	Billing on Invoice 8889									
87554	FEES 560.00			0.00		8889				
	DISBS 1.44									
Jan 20/2015	Lawyer: KM 0.10 Hrs X 160.00									
88108	Reviewed ECF court order of Judge Lee, motion for default to be filed by 2/20/15 and noticed for 2/24/15. Reviewed ECF court order of Judge Lee case terminated.				16.00	8955				
Feb 9/2015	Lawyer: KM 0.20 Hrs X 160.00									
88344	Reviewed file materials for status of adjusted audit and next court-related matter to be completed. (.1) Prepared correspondence to J. Conklin [REDACTED] [REDACTED] [REDACTED] [REDACTED]. Reviewed correspondence from J. Conklin [REDACTED] [REDACTED] (.1)				32.00					
Feb 10/2015	Chicago Regional Council of Carpe									
87854	PMT -	01571	561.44							
Feb 17/2015	Billing on Invoice 8955									
88146	FEES 252.00			0.00		8955				
Feb 18/2015	Lawyer: KM 2.90 Hrs X 160.00									
88343	Reviewed correspondence from J. Conklin [REDACTED]; reviewed adjusted audit report. (.3) Drafted motion for entry of default judgment and supporting documents including declaration of J. Libby, declaration of K. McJessey and draft order of judgment; reviewed file documents as necessary to prepare motion and declarations and to pull exhibits. (2.4) Confer with J. Conklin regarding [REDACTED] (.1) Telephone call with J. Libby regarding [REDACTED] (.1)				464.00					
Feb 19/2015	Lawyer: KM 0.40 Hrs X 160.00									
88345	Final review of J. Libby declaration and revisions to correct minor errors and attached relevant exhibits. (.3) Prepared correspondence to J. Libby forwarding [REDACTED] (.1)				64.00					

UNBILLED					BILLED				BALANCES	
TOTALS	CHE	+	RECOV	= TOTAL	DISBS	+	FEES	+ TAX	= A/R	TRUST
PERIOD	0.00		0.00	560.00	934.40		4278.00	0.00	4960.40	0.00
END DATE	0.00		0.00	560.00	934.40		4278.00	0.00	4960.40	0.00

UNBILLED					BILLED				BALANCES	
FIRM TOTAL	CHE	+	RECOV	= TOTAL	DISBS	+	FEES	+ TAX	= A/R	TRUST
PERIOD	0.00		0.00	560.00	934.40		4278.00	0.00	4960.40	0.00
END DATE	0.00		0.00	560.00	934.40		4278.00	0.00	4960.40	0.00

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**14 CV 03738**

**Exhibit D**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF  
CARPENTERS PENSION FUND, et al.,

Plaintiffs,

v.

ARCHITECTURAL SYSTEMS, INC., an Illinois  
corporation,

Defendant.

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14 CV 3738

Judge Lee

**FINAL JUDGMENT**

Pursuant to Federal Rules of Civil Procedure 54, 55 and 58, judgment is hereby entered in favor of the Chicago Regional Council of Carpenters Pension Fund *et al.* ("Trust Funds") and against defendant ARCHITECTURAL SYSTEMS, INC. an Illinois corporation ("Defendant") in the amount of \$28,605.31 as follows:

- A. \$15,220.68 in unpaid contributions pursuant to the audit;
- B. \$4,021.20 for auditor's fees incurred by the Trust Funds to complete the audit of Defendant's books and records;
- C. \$587.98 in interest;
- D. \$3,003.05 in liquidated damages; and
- E. \$5,772.40 in reasonable attorneys' fees and costs the Trust Funds incurred in this action.

The Trust Funds shall also recover reasonable attorney' fees and costs incurred by the Trust Funds in enforcing this order and any such further relief as this Court deems appropriate.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Judge John Lee